

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FARRAH SHOUKRY, individually and on behalf of all
other similarly situated,

Plaintiff,

-against-

FISHER-PRICE INC., a Delaware Corporation and
MATTEL, INC., a Delaware Corporation, each separately
and on behalf of all other entities similarly situated,

Defendants.

ECF CASE

**Civil Action No. 07 CV 7182 (DLC)
(DCF)**

**NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION**

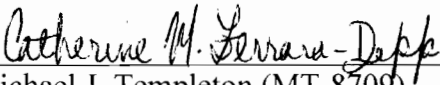
PLEASE TAKE NOTICE that, upon the accompanying Affidavit of Catherine M. Ferrara-Depp and the exhibits annexed thereto, Defendants Fisher-Price, Inc. and Mattel, Inc. will move this Court before the Honorable Denise L. Cote, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, 10007-1312, at a date and time to be determined by the Court, for an Order, in the form annexed hereto, granting the *pro hac vice* admission of Thomas E. Fennell to act as counsel for Fisher-Price, Inc. and Mattel, Inc. in this matter pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York and the Standing Order of this Court, dated October 25, 2006.

The full contact information for Thomas E. Fennell is:

Thomas E. Fennell, Esq.
Jones Day
2727 North Harwood Street
Dallas, TX 75201
Phone: (214) 220-3939
Fax: (214) 969-5100
tefennell@jonesday.com

The requisite fee of \$25.00 is submitted herewith.

Dated: New York, New York
October 9, 2007



Michael J. Templeton (MT-8709)
Catherine M. Ferrara-Depp (CF-2329)
JONES DAY
222 East 41st Street
New York, New York 10017
212-326-3939
Attorneys for Defendants
Fisher-Price, Inc. and Mattel, Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FARRAH SHOUKRY, individually and on behalf of all
other similarly situated,

Plaintiff,

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FISHER-PRICE INC., a Delaware Corporation and
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Defendants.

ECF CASE

**Civil Action No. 07 CV 7182 (DLC)
(DCF)**

**AFFIDAVIT OF CATHERINE M.
FERRARA-DEPP IN SUPPORT
OF MOTION FOR *PRO HAC*
VICE ADMISSION OF
THOMAS E. FENNELL**

STATE OF NEW YORK)

)ss:

COUNTY OF NEW YORK)

Catherine M. Ferrara-Depp, being duly sworn, deposes and says:

1. I am a member of the bar of the State of New York and of this Court in good standing and associated with the law firm of Jones Day, attorneys for Defendants Fisher-Price, Inc. and Mattel, Inc. (collectively, "Defendants"). I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' application for an order granting Thomas E. Fennell *pro hac vice* admission to act as counsel for Defendants in this matter, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and the Standing Order of this Court, dated October 25, 2006.

2. Thomas E. Fennell is a partner at the law firm of Jones Day and resident in the Dallas, Texas Office of Jones Day. He was admitted to practice before the Courts of the State of Texas on December 19, 1986, and before the Courts of the State of Ohio on November 5, 1975.

He is currently a member in good standing. He has never been disciplined and there are no pending disciplinary proceedings against him. Thomas E. Fennell is an individual of high moral character. A Certificate of Good Standing issued by the Supreme Court of Texas, dated September 28, 2007, is annexed hereto as Exhibit A, and a Certificate of Good Standing issued by the Supreme Court of Ohio, dated September 25, 2007, is annexed hereto as Exhibit B.

3. Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I respectfully request that Thomas E. Fennell be permitted to appear *pro hac vice* to act as counsel for the Defendants Fisher-Price, Inc. and Mattel, Inc. in this matter.

4. The full contact information for Thomas E. Fennell is:

Thomas E. Fennell, Esq.
Jones Day
2727 North Harwood Street
Dallas, TX 75201
Phone: (214) 220-3939
Fax: (214) 969-5100
tefennell@jonesday.com

5. The requisite fee of \$25.00 for this motion is submitted herewith.

6. Because no novel issue of law is involved in this motion, I further request that this Court waive the requirement of a supporting memorandum of law pursuant to Rule 1.7 of the Rules of the United States District Courts for the Southern and Eastern Districts of New York.

7. Annexed hereto as Exhibit C is a proposed order granting this motion.

8. There has been no prior application in this matter for the relief requested herein.

9. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, it is respectfully requested that this Court grant Thomas E. Fennell *pro hac vice* admission to act as counsel to Defendants in this matter.

Catherine M. Ferrara-Depp
Catherine M. Ferrara-Depp

Sworn to before me this
9th day of October, 2007

Deborah L. Aboud
NOTARY PUBLIC

DEBORAH L. ABOUD
NOTARY PUBLIC, State of New York
No. 01AB4995633
Qualified in Kings County
Commission Expires April 27, 2010

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

THOMAS EARL FENNELL

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 19th day of December, 1986.

I further certify that the records of this office show that, as of this date

THOMAS EARL FENNELL

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my hand
and the seal of the Supreme Court of
Texas at the City of Austin, this 28th day
of September, 2007.

BLAKE HAWTHORNE, Clerk

by Brad Sonogo
Brad Sonogo, Deputy Clerk

No. 4186A

The Supreme Court of Ohio

C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Thomas Earl Fennell

was admitted to the practice of law in Ohio on November 07, 1975; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 25th day of September, 2007.

SUSAN B. CHRISTOFF
Director, Attorney Services Division


Heidi Moore
Attorney Registration Assistant

CERTIFICATE OF SERVICE

I, Catherine M. Ferrara-Depp, hereby certify that on October 9, 2007, a true and correct copy of the foregoing NOTICE OF MOTION FOR *PRO HAC VICE* ADMISSION and all exhibits annexed thereto was served by United States mail with sufficient postage to ensure delivery on the following:

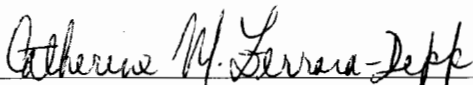
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